

**ORIGINAL**  
IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FOR THE FILED
JAN 24 2014
CLERK, U.S. DISTRICT COURT By _____ Deputy

UNITED STATES OF AMERICA,  
PLAINTIFF,

v.

DARREN L. REAGAN, et. al.,  
DEFENDANTS.

} CRIMINAL No. 3:07-CR-289-7

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**RENEWED MOTION FOR THE APPOINTMENT OF A SPECIAL PROSECUTOR**

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COMES NOW Defendant Darren L. Reagan (hereinafter referred to as "Defendant"), pro se, to enter this Renewed Motion for the Appointment of a Special Prosecutor, and states as follows:

1. Defendant is a layman at law, therefore as a pro se litigant he invokes the excusable error analysis of Haines v. Kerner, 404 U.S. 519 (1972), where this Court is required to hold Defendant's pleadings to a less stringent standard than motions drafted by a lawyer. See also Erickson v. Pardus, 551 U.S. 89, 94, 124 S. Ct. 2197, 167 L. Ed. 2d 1081 (2007).

2. Defendant filed his Supplemental Motion/Request for a New Trial (Pending My Direct Appeal) Based on Post Conviction (sic) "Newly Discovered Evidence" as Outlined in the Aforementioned/Referenced Motions/Requests and In the "Interest of Justice" Involving the Many "Conflicts of Interest" Related

to Sarah Saldana, Former A.U.S.A. and Now U.S. Attorney for the Northern District of Texas (hereinafter referred to as "Motion for New Trial") on March 27th, 2013. See Docket No. 1841, United States v. Darren Reagan, et. al., Criminal No. 3:07-CR-289-7 (United States District Court for the Northern District of Texas, Dallas Division).<sup>1</sup>

3. Defendant does not believe, based on the information contained in his Motion for New Trial (D.E. 1841), that the Plaintiff United States of America (hereinafter referred to as "United States") is adequately capable of arguing the merits of Defendant's claims through the Plaintiff's Dallas Office of the Northern District of Texas.

4. Defendant contends it would be proper for this Court to appoint a special prosecutor to assess the merits of Defendant's Motion for New Trial (D.E. 1841), to investigate Defendant's claims, and argue such in a response to such Motion for New Trial (D.E. 1841).

WHEREFORE Defendant prays for this Court to grant this Renewed Motion for Appointment of a Special Prosecutor in reference to Defendant's Motion for New Trial (D.E. 1841), and for any and such other relief as this Court may deem to be proper and just.

Respectfully submitted,

January 14th, 2014



DARREN L. REAGAN  
Defendant, pro se  
Register No. 37109-177  
FCI Oakdale  
Post Office Box 5000  
Oakdale, LA 71463-5000

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1. References to documents contained on the record will be referred to as "D.E." with the corresponding docket entry number after.

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was sent via U.S. Mail, postage prepaid, this 14th day of January, 2014, to:

Clerk of the United States District Court  
Northern District of Texas, Dallas Division  
United States Courthouse  
1100 Commerce, Room 1452  
Dallas, TX 75242-1495

U.S. Department of Justice  
United States Attorney  
Northern District of Texas  
Dallas Office  
1100 Commerce Street, Third Floor  
Dallas, TX 75242-1027  
Plaintiff

  
Defendant, pro se

**United States Court of Appeals**  
FIFTH CIRCUIT  
OFFICE OF THE CLERK

**LYLE W. CAYCE**  
CLERK

TEL. 504-310-7700  
600 S. MAESTRI PLACE  
NEW ORLEANS, LA 70130

November 14, 2012

#37109-177  
Mr. Darren L. Reagan  
FCI Oakdale  
1507 E. Whatley Road, P.O. Box 5000  
Oakdale, LA 71463-0000

No. 10-10211, USA v. Darren Reagan, et al  
USDC No. 3:07-CR-289-7

We received your motion to appoint special prosecutor.

This matter must be addressed to the district court, we are taking no action on this motion.

Sincerely,

LYLE W. CAYCE, Clerk

By:   
Steve A. Totora, Deputy Clerk  
504-310-7667

cc: Ms. Susan Cowger  
Mr. Douglas C. Greene Sr.  
Mr. James Wesley Hendrix  
Mr. Seth Kretzer  
Mr. Kevin Blake Ross  
Ms. Leigha Amy Simonton

Congress of the United States  
House of Representatives  
Washington, DC 20515-4333

January 7, 2014

Mr. Darren Reagan  
Federal Correctional Institution- Reg# 37109-177  
PO Box 5000  
Oakdale, LA 71463-5000

Dear Mr. Reagan,

I received the completed Privacy Act Release Form. An inquiry has been made on your behalf with the U.S. Department of Justice. I have asked that they respond to you not receiving a response after contacting several agencies within the DoJ.

As soon as a response is received, I will forward it to you. Your inquiry has been assigned to my staff assistant, Jennifer Ward, in my Fort Worth District Office.

Sincerely,



Marc Veasey  
Member of Congress

MV/JW

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CLERK OF THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION  
UNITED STATES COURTHOUSE  
1100 COMMERCE, ROOM 1452  
DALLAS, TX

75242-1495

Attn: Ms. Glenda Richardson

(Legal)

JAN 22 2014

MAILROOM 302 00